

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PEARSON EDUCATION INC., ET AL,

Plaintiffs,

-against-

ALLEN AIR CONDITIONING CO., ET AL,

Defendants

2008 Civ. 06152 (RJH)

**MOTION FOR ADMISSION OF
JOHN T. MITCHELL *PRO HAC*
*VICE***

PLEASE TAKE NOTICE that, upon the declaration of Patrick W. Begos and the Certificate of Good Standing for John T. Mitchell, both of which are annexed, and pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, the undersigned hereby moves this Court, at the Courthouse, 500 Pearl Street, New York, New York, for an order admitting

John T. Mitchell
Interaction Law
1629 K Street, NW, Suite 300
Washington, DC 20006
Phone: 202-415-9213
Fax: 202-318-9169

pro hac vice, to argue or try this action in whole or in part for defendants for Allen Air Conditioning Co., Ganghua Liu and Jian Liu.

Dated: Bronxville, New York
August 25, 2008

BEGOS HORGAN & BROWN LLP

By: S/ Patrick W. Begos
Patrick W. Begos (PB4372)
7 Pondfield Road
Bronxville, NY 10708
(914) 961-4441

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SOUTHERN DISTRICT OF NEW YORK

PEARSON EDUCATION INC., ET AL,

Plaintiffs,

-against-

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Defendants

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**DECLARATION OF
PATRICK W. BEGOS
IN SUPPORT OF MOTION
TO ADMIT COUNSEL *PRO
HAC VICE***

PATRICK W. BEGOS declares the following to be true under penalty of perjury:

1. I am an attorney licensed to practice in the courts of this State, and this Court. I am a member of the firm of Begos Horgan & Brown LLP. I submit this declaration in support of the motion to admit John T. Mitchell, *pro hac vice*, on behalf of defendants Allen Air Conditioning Co., Ganghua Liu and Jian Liu in the above captioned matter.

2. Mr. Mitchell is a member in good standing of the Bar of the District of Columbia, with offices located at 1629 K Street, NW, Suite 300, Washington, DC 20006. I annex hereto a Certificate of Good Standing from the District of Columbia's Court of Appeals dated August 22, 2008.

3. Accordingly, I am pleased to move the admission of John T. Mitchell, *pro hac vice*, and respectfully submit the proposed Order granting such admission.

WHEREFORE it is respectfully requested that the motion to admit John T. Mitchell, *pro hac vice*, to represent defendants Allen Air Conditioning Co., Ganghua Liu and Jian Liu in the above captioned matter, be granted.

Dated: Bronxville, New York
August 25, 2008

S/ Patrick W. Begos
Patrick W. Begos (PB4372)
BEGOS HORGAN & BROWN LLP
7 Pondfield Road
Bronxville, NY 10708
(914) 961-4441



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JOHN T. MITCHELL

was on the 12TH day of MAY, 1989
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on August
22, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles
Deputy Clerk

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**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Patrick W. Begos and said sponsor's affidavit in support:

IT IS HEREBY ORDERED that

John T. Mitchell
Interaction Law
1629 K Street, NW, Suite 300
Washington, DC 20006
Phone: 202-415-9213
Fax: 202-318-9169
E-mail: john@interactionlaw.com

is admitted to practice *pro hac vice* as counsel for defendants for Allen Air Conditioning Co., Ganghua Liu and Jian Liu in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: August ____, 2008

United States District/Magistrate Judge